

Trey A. Monsour
State Bar No. 14277200
Polsinelli PC
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tmonsour@polsinelli.com

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
Polsinelli PC
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com

COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

Senior Care Centers, LLC, *et al.*,¹

Debtors.

§
§ Chapter 11
§
§ Case No. 18-33967 (BJH)
§
§ (Jointly Administered)
§

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MARCH 21, 2019 AT 2:00 P.M. (CT)**

MATTERS GOING FORWARD

1. Motion of Debtors for Entry of an Order Extending the Deadline to Assume or Reject Unexpired Leases and Nonresidential Real Property [Docket No. 592; Filed: 2/28/2019]

Objection Deadline: March 20, 2019

Related Document(s):

- a) Omnibus Notice of Hearing [Docket No. 607; Filed: 3/01/2019]

Response(s) Received:

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

- a) Informal comments from Committee
- b) Informal comments from TXMS Real Estate Investments, Inc.

Status: This matter will go forward.

2. Motion of Debtors for Entry of an Order Extending Exclusivity Periods for the Filing and Solicitation of Acceptance of a Chapter 11 Plan [Docket No. 596; Filed: 2/28/2019]

Objection Deadline: March 20, 2019

Related Document(s):

- a) Omnibus Notice of Hearing [Docket No. 607; Filed: 3/01/2019]

Response(s) Received:

- a) None.

Status: This matter will go forward.

3. Motion of Debtors for Entry of an Order Establishing Bar Dates, Approving Form and Manner of Notice and Approving Procedures for Filing Claim [Docket No. 599; Filed: 2/28/2019]

Objection Deadline: March 20, 2019

Related Document(s):

- a) Omnibus Notice of Hearing [Docket No. 607; Filed: 3/01/2019]

Response(s) Received:

- a) Informal comments from the United States Trustee
- b) Informal comments from the United States Department of Justice

Status: This matter will go forward.

4. Motion to Reject Certain "Granite" Leases *Nunc Pro Tunc* [Docket No. 211; Filed: 12/27/2018]

Objection Deadline: January 17, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 220; Filed: 12/28/2018]

- b) Supplement to Motion to Reject Certain "Granite" Leases *Nunc Pro Tunc* [Docket No. 469; Filed: 2/5/2019]
- c) Amended Notice of Hearing [Docket No. 487; Filed: 2/11/2019]

Response(s) Received:

- a) Granite Landlords' Objection to Motion to Reject Certain "Granite" Leases *Nunc Pro Tunc* [Docket No. 397; Filed: 1/18/2019]
- b) The United States of America's Limited Objection and Reservation of Rights with Respect to the Debtors' Lease Rejection Motions [Docket No. 407; Filed: 1/21/2019]

Status: This matter will go forward as a status conference only.

5. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 24; Filed: 12/5/2018]

Objection Deadline: March 18, 2019

Related Document(s):

- a) Findings of Fact and Conclusions of Law Regarding the Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 74; Entered: 12/7/2018]
- b) Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 75; Entered: 12/7/2018]
- c) Preliminary Omnibus Reply in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 199; Filed: 12/26/2018]
- d) Debtors' Memorandum of Law Regarding the Debtors' Obligation to Pay Rent for Nursing Home Leases Subject to a Pending Rejection Motion [Docket No. 321; Filed: 1/10/2019]

- e) Second Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 431; Entered: 1/24/2019]
- f) Revised Budget [Docket No. 351; Filed: 1/14/2019]
- g) Notice of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et. al., of an Agreed Extension of the Challenge Deadline [Docket No. 590; Filed 2/28/2019]
- h) Notice of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et. al., of a Second Agreed Extension of the Challenge Deadline [Docket No. 486; Filed 2/11/2019]
- i) Third Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 673; Entered 3/14/2019]

Response(s) Received:

- a) Objection of Texas Ad Valorem Taxing Jurisdictions to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 117; Filed: 12/12/2018]
- b) Texas Health and Human Services Commission's Limited Objection to motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 142; Filed: 12/17/2018]
- c) Limited Objection of San Antonio North Knoll, LLC to the Use of Cash Collateral [Docket No. 146; Filed: 12/19/2018]
- d) Response of HC Hill Country Associates, Ltd., H-C Associates, Ltd., HC-RW Associates Ltd., Hidalgo Healthcare Realty, LLC, and Socorro Health Realty, LLC to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 148; Filed: 12/19/2018]
- e) CCP Landlords' Reservation of Rights and Limited Objection to Debtors' Motion to Use Cash Collateral [Docket No. 149; Filed: 12/19/2018]

- f) Objection of OLP Wyoming Springs, LLC to (I) Motion for Entry of Order Authorizing Payment of Prepetition Taxes and Fees; and (II) Motion for Entry of Interim and Final Orders Authorizing the Use of Cash Collateral [Docket No. 151; Filed: 12/19/2018]
- g) Limited Objection of Atlas Dental Management, LLC to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 152; Filed: 12/19/2018]
- h) TXMS Real Estate Investments, Inc.'s Objection to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 153; Filed: 12/19/2018]
- i) Objection of PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 154; Filed: 12/19/2018]
- j) Limited Objection of KeyBank National Association to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 155; Filed: 12/19/2018]
- k) The United States of America's Limited Objection to Debtors' Motion for Entry of Interim and Final Order Authorizing Use of Cash Collateral [Docket No. 157; Filed: 12/19/2018]
- l) Tax Authorities' Objection to Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 158; Filed: 12/19/2018]
- m) Granite Landlords' Limited Objection and Limited Joinder in KeyBank National Association's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 174; Filed: 12/21/2018]

- n) Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 187; Filed: 12/21/2018]
- o) CCP Landlords' First Amended Objection to Debtors' Motion to Use Cash Collateral [Docket No. 189; Filed: 12/21/2018]
- p) Brief in Support of Objection of PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 205; Filed: 12/26/2018]
- q) Limited Objection of Love Funding Corporation to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 270; Filed: 1/7/2019]
- r) Limited Objection of Onsite Dentists of Texas to Debtors' Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 293; Filed: 1/9/2019]
- s) CCP Landlords' Memorandum of Law in Support of Debtors' Obligations to Timely Pay Post-Petition Rental Obligations [Docket No. 302; Filed: 1/10/2019]
- t) HC Hill Country Associates, Ltd., H-C Associates, Ltd., HC-RW Associates Ltd., Hidalgo Healthcare Realty, LLC, and Socorro Health Realty, LLC's Memorandum of Law in Support of Response to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 307; Filed: 1/10/2019]
- u) OLP Wyoming Springs, LLC's Supplemental Brief in Support of Objection to (I) Taxes Motion and (II) Cash Collateral Motion [Docket No. 312; Filed: 1/10/2019]
- v) Cedar Park Healthcare, LLC's Hearing Brief Regarding Debtors' Post-Petition Lease Obligations Pending Rejection and Transition of Operations [Docket No. 313; Filed: 1/10/2019]

- w) TXMS Real Estate Investments, Inc.'s Surreply Brief in Support of Its Objection to Debtors Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 314; Filed: 1/10/2019]
- x) Brief in Support of Granite Landlords' Limited Objection and Limited Joinder in KeyBank National Association's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 315; Filed: 1/10/2019]
- y) Limited Objection of Berkadia Commercial Mortgage LLC to Motion of Debtors for Entry of Interim and Final Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 320; Filed: 1/10/2019]
- z) G Debtors' Brief in Opposition Regarding the Debtors' Obligation to Pay Rent for Nursing Home Leases Subject to a Pending Rejection Motion [Docket No. 324; Filed: 1/10/2019]
- aa) Limited Objection of Texas Nursing Home Management Solutions, LLC to Debtors' Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 344; Filed: 1/12/2019]
- bb) Texas Health and Human Services Commission's Supplemental Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 370; Filed: 1/16/2019]
- cc) Cedar Park Healthcare, LLC's Response to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 499; Filed: 2/13/2019]

- dd) POTA JV, LLC's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 531; Filed: 2/19/2019]
- ee) Brief In Opposition filed by Creditor PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion to Use Cash Collateral [Docket No. 712; Filed 03/18/2019]
- ff) Patient Care Ombudsman Request for Payment of Fees and Costs and Objection to the Use of Cash Collateral to Pay Professionals Significantly More Than Which Was Budget for the PCO and His Counsel [Docket No. 720; Filed 3/19/2019]

Status: This matter will go forward.

6. Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement, and (II) Granting Related Relief [Docket No. 574; Filed: 2/26/2019]

Objection Deadline: March 15, 2019

Related Document(s):

- a) Omnibus Notice of Hearing [Docket No. 586; Filed: 2/26/2019]
- b) Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 580; Filed 2/26/2019]
- c) Debtors' Motion for Expedited Consideration of Various Motions of Debtors for Entry of An Order Approving Settlement Agreements and Transfer of Operations Pursuant to Operations Transfer Agreements [Docket No. 591; Filed: 2/28/2019]
- d) Order Granting Motion for Expedited Consideration of Various Motions of Debtors for Entry of An Order Approving Settlement Agreements and Transfer of Operations Pursuant to Operations Transfer Agreements [Docket No. 600; Entered: 3/01/2019]
- e) Declaration of Kevin O'Halloran, Chief Restructuring Officer of Debtors, in Support of Settlement & Sale Motions [Docket No. 715; Filed 3/19/2019]

Response(s) Received:

- a) United States Trustee's Omnibus Response to (A) Motions to Approve Operations Transfer Agreements and Transferring Operations and (B) Motion to Compromise Controversy [Docket No. 669; Filed: 3/14/2019]
- b) Omnibus Objection to Motion to Compromise Controversy with Sabra Health Care REIT, Inc. filed by Debtor Senior Care Centers, LLC, Motion to Compromise Controversy with Soccoro Health Realty, LLC, filed by Debtor Senior Care Centers, LLC, Motion to Compromise Controversy with Navarro SNF Development, LP, filed by Debtor Senior Care Centers, LLC, Motion to Compromise Controversy with PM Management Park-Cedar Park, NC LLC, filed by Debtor Senior Care Centers, LLC, Motion to Compromise Controversy with Windmill SCC LLC, filed by Debtor Senior Care Centers, LLC, Motion to Compromise Controversy with LA Hacienda SCC LLC, filed by Debtor Senior Care Centers LLC, Debtors' Motion to Compromise filed by Interested Party Texas Health and Human Services Commission [Docket No. 671: Filed 3/14/2019]

- c) Objection to Motion to compromise controversy with Sabra Health Care REIT, Inc., filed by Debtor Senior Care Centers, LLC, 575 Motion to compromise controversy with Socorro Health Realty, LLC. filed by Debtor Senior Care Centers, LLC, Motion to compromise controversy with Navarro SNF Development, LP, filed by Debtor Senior Care Centers, LLC, Motion to compromise controversy with PM Management Park-Cedar Park, NC LLC, filed by Debtor Senior Care Centers, LLC, Motion to compromise controversy with Windmill SCC LLC, filed by Debtor Senior Care Centers, LLC, 579 Motion to compromise controversy with LA Hacienda SCC LLC. filed by Debtor Senior Care Centers, LLC, Motion to sell property free and clear of liens under Section 363(f) Motion [Sabra Health Care] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of the Transfer Portfolio filed by Debtor Senior Care Centers, LLC, Motion to sell property free and clear of liens under Section 363(f) Motion [Socorro Health Realty] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of the Transfer Portfolio filed by Debtor Senior Care Centers, LLC, Motion to sell property free and clear of liens under Section 363(f) Motion [Trisun Care Center Corsicana] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of the Transfer P filed by Debtor Senior Care Centers, LLC, Motion to sell property free and clear of liens under Section 363(f) Motion [Cottonwood Creek Nursing and Rehab Center] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of t filed by Debtor Senior Care Centers, LLC, Motion to sell property free and clear of liens under Section 363(f) Motion [Windmill Nursing & Rehab Center] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of the Transfer, filed by Debtor Senior Care Centers, LLC, Motion to sell property free and clear of liens under Section 363(f) Motion [La Hacienda Nursing & Rehab Center] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of the Transfer, filed by Debtor Senior Care Centers, LLC, filed by Interested Party United States of America [Docket No. 672: Filed 3/14/2019]
- d) Objection to Motion to Compromise Controversy with Sabra Health Care REIT, Inc. filed by Debtor Senior Care Centers LLC, the Official Committee of Unsecured Creditors' Objection to Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement, and (II) Granting Related Relief with Sabra Health Care Reit, Inc. filed by Creditors Committee Official Committee of Unsecured Creditors [Docket No. 678: Filed 3/14/2019]

- e) Objection to Motion to Compromise Controversy with Sabra Health Care REIT, Inc. filed by Debtor Senior Care Centers, LLC, Motion to Sell Property Free and Clear of Liens Under Section 363(f) Motion [Sabra Health Care] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of the Transfer Portfolio filed by Debtor Senior Care Centers LLC [Docket No. 688: Filed 3/15/2019]
- f) Objection to Motion to Compromise Controversy with Sabra Health Care REIT, Inc., filed by Debtor Senior Care Centers LLC, Motion to Sell Property Free and Clear of Liens Under Section 363(f) Motion [Sabra Health Care] for Entry of Order Approving Form of Operations Transfer Agreement, Authorizing Transfer of Operations and Related Assets of the Transfer Portfolio filed by Debtor Senior Care Centers LLC, filed by Creditor CIBC Bank USA, as Administrative Agent [Docket No. 699: Filed 3/15/2019]
- g) Amended Objection to Motion to Compromise Controversy with Sabra Health Care REIT, Inc., filed by Debtor Senior Care Centers, LLC, filed by Creditor Committee Official Committee of Unsecured Creditors [Docket No. 703: Filed 3/17/2019]

Status: This matter will go forward.

7. Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 580; Filed: 2/26/2019]

Objection Deadline: March 15, 2019

Related Document(s):

- a) Omnibus Notice of Hearing [Docket No. 586; Filed: 2/26/2019]
- b) Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement, and (II) Granting Related Relief [Docket No. 574; Filed: 2/26/2019]
- c) Debtors' Motion for Expedited Consideration of Various Motions of Debtors for Entry of An Order Approving Settlement Agreements and Transfer of Operations Pursuant to Operations Transfer Agreements [Docket No. 591; Filed: 2/28/2019]
- d) Order Granting Motion for Expedited Consideration of Various Motions of Debtors for Entry of An Order Approving Settlement Agreements and Transfer of Operations Pursuant to Operations Transfer Agreements [Docket No. 600; Entered: 3/01/2019]

- e) Declaration of Kevin O'Halloran, Chief Restructuring Officer of Debtors, in Support of Settlement & Sale Motions [Docket No. 715; Filed 3/19/2019]

Response(s) Received:

- a) Tax Authorities Limited Objection to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 650; Filed 3/8/2019]
- b) Texas Taxing Jurisdictions' Objection to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 657; Filed 3/12/2019]
- c) Tax Authorities Amended Limited Objection to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 662; 3/12/2019]
- d) Omnibus Limited Objection and Reservation of Rights of Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 664; Filed 3/13/2019]
- e) United States Trustee's Omnibus Response to (A) Motions to Approve Operations Transfer Agreements and Transferring Operations and (B) Motion to Compromise Controversy [Docket No. 669; Filed: 3/14/2019]
- f) Texas Health and Human Services Commission's Omnibus Objection to Debtors' Sale Motions [Docket No. 670; 3/14/2019]
- g) Reservation of Rights and Limited Objection of the United States of America to Debtors' Motions to Sell Transfer Portfolios [Docket No. 672: Filed 3/14/2019]

- h) Objection to Motion to Compromise Controversy with Sabra Health Care Reit, Inc. filed by Debtor Senior Care Centers LLC, the Official Committee of Unsecured Creditors' Objection to Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement, and (II) Granting Related Relief with Sabra Health Care Reit, Inc. filed by Creditors Committee Official Committee of Unsecured Creditors [Docket No. 678: Filed 3/14/2019]
- i) Objection of Cigna Healthcare of Texas, Inc. to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 679; Filed 3/15/2019]
- j) Objection of Louisiana Department of Health to Debtors Motion Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 688: Filed 3/15/2019]
- k) Limited Objection of Atlas Dental Management, LLC to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 689; 3/15/2019]
- l) Limited Objection of Onsite Dentists of Texas and Texas Nursing Home Management Solutions, LLC to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 694; Filed 3/15/2019]
- m) Limited Objection of Onsite Dentists of Texas and Texas Nursing Home Management Solutions, LLC to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 695; Filed 3/15/2019]

- n) Objection of CIBC Bank USA to the Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of the Transfer Portfolio Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (II) Granting Related Relief [Docket No. 699: Filed 3/15/2019]
- o) Amended Objection to Motion to Compromise Controversy with Sabra Health Care Reit, Inc., filed by Debtor Senior Care Centers, LLC, filed by Creditor Committee Official Committee of Unsecured Creditors [Docket No. 703: Filed 3/17/2019]
- p) Notice of Resolution of Cigna Objections [Docket No. 709; Filed 3/18/2019]

Dated: March 19, 2019
Dallas, Texas

POLSINELLI PC

/s/ Trey A. Monsour

Trey A. Monsour
State Bar No. 14277200
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tmonsour@polsinelli.com

-and-

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com

Counsel to the Debtors and Debtors in Possession